

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ACCESS 4 ALL, INC. and FELIX ESPOSITO,

Plaintiffs,

v.

MASSACHUSETTS MUTUAL LIFE
INSURANCE CO.,

Defendant.

NO. 1: 04CV12240 (GAO)

**ASSENTED-TO MOTION FOR 30-DAY EXTENSION OF TIME FOR
DEFENDANT MASSACHUSETTS MUTUAL LIFE INSURANCE CO.
TO FILE RESPONSIVE PLEADING**

Pursuant to Rule 7(b) of the Federal Rules of Civil Procedure and Local Rule 7.1, Defendant Massachusetts Mutual Life Insurance Co. ("Defendant"), moves for a 30-day extension of time to file a responsive pleading to the Complaint up to and through December 28, 2004. The extension is necessary to allow Defendant's counsel, who has just recently been retained to defend in this matter, to investigate adequately the allegations and prepare an appropriate response. Counsel for Plaintiffs has consented to this extension.

WHEREFORE, Defendant Massachusetts Mutual Life Insurance Co. respectfully requests that it be granted a 30-day extension of time in which to file a responsive pleading to the Complaint up to and through December 28, 2004, and that the Court enter an order in a form similar to the proposed order attached as Exhibit A.

Respectfully submitted,

MASSACHUSETTS MUTUAL LIFE
INSURANCE CO.,

By its attorneys,

/s/: Heather C. Krauss

Barry A. Guryan, BBO # 214920

Heather C. Krauss, BBO # 644457

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Dated: November 24, 2004

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of November, 2004, I served a copy of the foregoing
Assented –To Motion For 30-day Extension of Time for Massachusetts Mutual Life Insurance
Co. to File Responsive Pleading and proposed Order by first-class mail to counsel for Plaintiffs:

O. Oliver Wragg, Esq.
Lawrence A. Fuller, Esq.
Fuller, Fuller and Associates, P.A.
12000 Biscayne Blvd., Suite 609
North Miami, FL 33181

/s/: Heather C. Krauss

Heather C. Krauss

EXHIBIT A

UNITED STATES DISTRICT COURT
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ACCESS 4 ALL, INC. and FELIX ESPOSITO,

Plaintiffs,

v.

MASSACHUSETTS MUTUAL LIFE
INSURANCE CO.,

Defendant.

NO. 1: 04CV12240 (GAO)

**ORDER GRANTING CONSENT MOTION FOR 30-DAY EXTENSION OF TIME FOR
DEFENDANT MASSACHUSETTS MUTUAL LIFE INSURANCE CO.
TO FILE RESPONSIVE PLEADING**

Upon consideration of the Assented-To Motion for 30-Day Extension of Time for
Massachusetts Mutual Life Insurance Co. to file Responsive Pleading, it is this ____ day of
_____, 2004, hereby

ORDERED that the motion be, and the same hereby is, GRANTED;

ORDERED that Defendant shall file a responsive pleading on or before December 28,
2004.

SO ORDERED.

George A. O'Toole, Jr.
United States District Judge